

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL No. 2804

*This document relates to:*

Case No. 1:17-md-2804

*All Cases Noted on Attached Exhibit*

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO FLORIDA TEVA SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Actavis, LLC, and Actavis Pharma, Inc. (together, “Teva”<sup>1</sup>) that, pursuant to the election of each Dismissing Plaintiff to participate in the Teva Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Teva Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

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<sup>1</sup> The Teva Settlement Agreement is between the State of Florida, Office of Attorney General on the one hand and Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Actavis, LLC, and Actavis Pharma, Inc., on the other, but the Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which includes Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Actavis, LLC, and Actavis Pharma, Inc., and also includes Watson Laboratories, Inc.; Warner Chilcott Company, LLC; Actavis South Atlantic LLC; Actavis Elizabeth LLC; Actavis Mid Atlantic LLC; Actavis Totowa LLC; Actavis Kadian LLC; Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc.-Salt Lake City; and Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc.-Florida. Settlement Agreement §A(bb) (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: May 25, 2022

Respectfully submitted,

Agreed as to form and substance:

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SO ORDERED this \_\_\_ day of May, 2022.

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Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

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